

---

## SMALL PROJECTS EXEMPT FROM DSA REVIEW

---

# IR A-22

### References:

Issued 08-15-08

California Building Code, Part 1, Section 4-314, Part 2, Section 1134B

Discipline: Structural, Fire-Life Safety, Access Compliance

This Interpretation of Regulations (IR) is intended for use by the Division of the State Architect (DSA) staff, and as a resource for design professionals, to promote more uniform statewide criteria for plan review and construction inspection of projects within the jurisdiction of DSA, which include State of California public elementary and secondary schools (grades K-12), community colleges, and state-owned or state-leased essential services buildings. This IR indicates an acceptable method for achieving compliance with applicable codes and regulations, although other methods proposed by design professionals may be considered by DSA.

This IR is reviewed on a regular basis and is subject to revision at any time. Please check the DSA web site for currently effective IR's. Only IR's listed in the document at <http://www.dsa.dgs.ca.gov/Pubs/default.htm> (click on "DSA Interpretation of Regulations Manual") at the time of plan submittal to DSA are considered applicable.

---

**Purpose:** The purpose of this Interpretation of Regulations (IR) is to clarify when plans and specifications for small construction projects on existing public school sites are required to be submitted to the Division of the State Architect (DSA) for review, approval and construction oversight.

**1. Access Compliance Requirements:** Some projects that are exempt from the Field Act (Education Code Sections 17280-17317, 17365-17374, and 81130-81149) are required to be submitted to DSA for review and approval by the Access Compliance Section of DSA. See Government Code Sections 4450-4461. Also see Appendix A of this IR for projects that fall into this category.

**2. California Building Standards Code Compliance:** Projects subject to the Field Act but not requiring DSA approval shall comply with all currently effective design, construction and inspection provisions of the California Code of Regulations, Title 24. When authorizing construction of projects described in this interpretation, the school district assumes responsibility to assure compliance with all code provisions. Architects and engineers providing project design must be licensed as required by the rules governing the licensing of architects and engineers. See Business and Profession Code Sections 6735 and 5535 through 5538.

All projects, whether governed by the Field Act or not, shall comply with all applicable accessibility provisions of the California Code of Regulations, Title 24.

**3. Exempt Small Projects:** See Appendix A for a list of small projects and the review requirements for Structural Safety (SS), Fire-Life Safety (FLS) and/or Access Compliance (AC). Items listed in the Appendix are exempt only when they constitute the entire scope of a project.

**4. Exempt Reconstruction and Alterations:** In addition to projects listed in Appendix A, projects involving alterations, repairs or additions to existing school buildings may be exempt from DSA review and approval based on the estimated construction costs. Refer to [IR A-10](#), "Reconstruction and Alteration Projects – Exemption from DSA Approval".

**5. Voluntary Submittal:** This interpretation does not preclude a school district from choosing to submit plans and specifications for exempt projects, with the appropriate fee to DSA for review. Voluntary submittal of an exempt project will trigger full DSA plan review for code conformance and construction oversight including inspections and materials testing.

## Appendix A –Review of Small Projects

Those items eligible for exemption listed below are exempt from DSA review and approval only when they constitute the entire scope of a project.

Project Description	SS/FLS Review Required?		Access Compliance Review Required?	
	Yes	No	Yes	No
1. Poles less than 35 feet tall (lighting poles, flag poles, poles supporting open mesh fences, etc.)		✓		✓ <sup>1</sup>
2. Poles less than 25 feet above the roof line when attached to an existing school building (antennas, flag poles, etc.)		✓		✓ <sup>1</sup>
3. Cell or antenna towers	✓			✓
4. Soil retaining walls less than 4 feet tall without surcharge or a sloping backfill		✓		✓ <sup>1</sup>
5. Baseball dugouts less than 250 sq. ft. of floor area with lightweight roof construction and walls less than 4 feet tall resisting (active, passive or at rest) soil pressure with no sloping backfills or surcharge.		✓	✓ <sup>2</sup>	
6. Ball walls or yard walls less than 6 feet above grade		✓		✓ <sup>1</sup>
7. Free standing signs, scrolling message signs, scoreboards, or solid clad fences less than 8 feet above grade		✓		✓ <sup>1,4</sup>
8. Bleachers and grandstands five rows of seats or less		✓	✓ <sup>2</sup>	
9. Ancillary accessory facilities to athletic fields with light metal or wood frame construction (one-story, not over 250 square feet, used for equipment storage, toilets, snack bars, ticket booths, etc.)		✓	✓ <sup>2</sup>	
10. Playground equipment		✓	✓ <sup>3</sup>	
11. Large playground equipment resembling buildings and over 250 square feet	✓		✓ <sup>3</sup>	
12. Open-mesh baseball backstops		✓	✓ <sup>3</sup>	
13. Open-mesh fences		✓		✓ <sup>4</sup>
14. New or replacement of sidewalks		✓	✓	
15. Landscaping		✓	✓ <sup>4</sup>	
16. Replacement in kind of mechanical, electrical, or plumbing units when the cost does not exceed the thresholds in IR A-10		✓		✓
17. Cosmetic maintenance work such as painting, re-carpeting, wallpapering, reroofing, etc., as defined in Title 24, Part 1, Section 4-314.		✓		✓

18. Installation of synthetic (artificial turf) play fields or running tracks		✓	✓	
19. Installation of new parking areas		✓	✓	
20. Installation of new surfacing over existing parking areas (such as asphalt overlays)		✓	✓ <sup>5</sup>	
21. Removal and replacement of existing parking area surfacing		✓	✓ <sup>5</sup>	
22. Installation of seal-coating at existing parking areas (including new striping), or normal maintenance such as restriping or the filling of potholes and cracks		✓		✓

- Notes:
1. No height limit for Access Compliance exemption
  2. Required for all, no exception.
  3. Access Compliance will review the accessible path of travel to the playground/facility
  4. Required if accessible path of travel is impacted
  5. If accessible parking spaces are impacted